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CV 1:20-09522
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May 11, 2022

Dear Judge Figueredo

I requested to the court, for the default judgment to be put aside 3 separate times, but never got a response. The Honorable, Judge Ramos did ask me about my response for the default judgment on our last conference call. I am requesting the default judgment be put aside for massive, diabolical fraud, committed by the haba law firm and Dicello Levitt law firm.

I never consented to the creation of the LLC. I offered five years of recent, tax returns to show I pay taxes as a sole proprietor and never as a limited liability corporation. A limited liability corporation pays quarterly, estimated taxes. I've never paid quarterly, estimated taxes. I also offered to show them my income for the last five years to show my indigent status. My intention was to put this issue behind us and have a final conclusion.

The first request to the court to put the default judgment aside was on November 16, 2021.

The second request to the court to put the default judgment the side was February 15, 2022

The third request to the court to put aside the judgment was May 2, 2022.

As I mentioned in multiple motions to the court. My family and I have received property and death threats as a direct result of Fraudulent, civil complaint. I was falsely accused of being a child rapist and a major sex trafficker. My advisories, are the original creators and the original distributors of this content. Prior to the evil accusations, I was never accused of these horrible crimes against humanity, online or off-line.

This malicious content created by my adversaries ended up in the New York post news paper and other media outlets. Many uneducated people don't understand what the word "alleged" means and automatically assume I'm a child rapist. These type of people have been sending me death threats and graphic images. I posted the graphic images of the death theats on the docket prior.

I had to relocate three separate times and also live in a car due to his death threats. My family I live in constant fear. Please help us put a stop to this abuse of process. The Honorable Judge Ramos was very concerned about these death threats.

I am currently out of state and not available for any in person conferences. I am available via telephone and email address. I am willing to comply with all court orders. I request not receive mail regarding the default judgment or the civil lawsuit.

My adversaries are accountable for legal malpractice, in case preparation. They conducted no asset check on me personally or the limited liability corporation prior to initiating this malicious law suit. That is their obligation as attorneys to do their due diligence. If they did an asset check on me, prior to launching the law suit they would've seen that I am the definition of

"Judgment proof."

Their diabolical, fraudulent plan was to put the financial burden on the court, in hopes to force me to give them my financial information and related material. This is pure abuse of litigation. My adversaries are attempting to abuse the legal system to take power and control over me.

Mrs. Haba filed a fraudulent police report with actual lies in it. She included a photograph in her complaint against me and obtained a restraining order that is active. This restraining order was obtained through fraud. That is a private picture of me on a movie set holding an antique prop firearm. I never sent that image to Haba. Haba told the reporting police officer that I was bragging about avoiding criminal charges. If I was bragging about avoiding criminal charges that would mean I'm guilty which I'm not. She twisted all my communication around to sound Nefarious. Haba will be accountable for her criminal and civil atrocious behavior. The police told Haba she does not have sufficient evidence to pursue criminal charges. I apologize for the vulgarity in my communications. There is no excuse for that.

I sent many communications throughout the lawsuit to Haba asking her a rhetorical question

“Why have you not made a criminal complaint? “

(These are crimes against humanity, crimes worse than a murderer)

The answer to the rhetorical question is, because there is no hard evidence. It was all a fraud and an attempt to extort me for financial gain. When I wouldn't give them information about Peter Nygard they decided to sue me out of spite and not logic. I'm here to bring the logic to you, your honor and not waste your time.

Please help our family and end this nightmare. Please put this default judgment to the side. It was obtained through fraud and abuse of process.

Thank you for your time and consideration

Jonathan Baram